

UNITED STATES BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS

In Re:

John Malone,

Chapter 13 Case No. 24-10885

Debtor

MOTION TO EMPLOY SPECIAL COUNSEL

Now comes the Debtor, and requests authorization to employ Attorney Andrew N. Coppo of the Greater Boston Title & Escrow as his special counsel. In support of this Motion, the Debtor provides as follows:

- 1. The Debtor filed for Chapter 13 bankruptcy protection on May 8, 2024.
- 2. The Debtor desires to employ as special counsel pursuant to 11 U.S.C. s.327 Attorney Andrew N. Coppo of the Greater Boston Title & Escrow, LLC, 60 Adams Street, #207, Milton, Massachusetts, for the special purpose of representing the Debtor in selling his real estate at 26 Savin Hill Avenue, Boston, MA.
- 3. Andrew N. Coppo, Esq. is an attorney experienced in real estate law.
- 4. The Debtor selected Andrew N. Coppo and the Greater Boston Title & Escrow. LLC because of his experience in this type of matter.
- 5. The duties and responsibilities of Andrew N. Coppo as special counsel the Debtor shall be limited to legal representation of the Debtor in selling his real estate at 26 Savin Hill Avenue, Boston, MA.
- 6. To the best of the Debtor's knowledge and belief, Andrew N. Coppo holds or represents no interest adverse to the estate.
- 7. The terms of the employment of Andrew N. Coppo, agreed to by the Debtor, subject to Court approval, is flat rate of \$3,500.00.
- 8. Utilizing counsel in this matter benefits the Debtor's estate since it will allow the Debtor to receive a fair value for his real estate and pay the Plan in full.

Wherefore, the Debtor by and through counsel, requests that the application to employ under the terms specified in this Motion be approved by the Court, and such other and further relief as is just and proper.

Debtor, by his attorney,